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San Jose, CA 95113
4 Telephone: (408) 291-7753
5 Counsel for Defendant CHANG

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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR-07-00554 JF
11)
Plaintiff,)
12)
vs.) DECLARATION OF COUNSEL IN
13) SUPPORT OF *EX PARTE* APPLICATION
DOMINIC CHANG,) FOR TRAVEL AUTHORIZATION
14)
Defendant.)
15)
16

17 I, Cynthia C. Lie, hereby declare as follows:

18 1. I am the Assistant Federal Public Defender appointed to represent Dominic Chang
19 in the above-captioned matter, in which Mr. Chang has pled guilty to three counts of tax evasion
20 in violation of Title 26, United States Code Section 7201. Mr. Chang is scheduled to be
21 sentenced on Wednesday, July 9, 2008.

22 2. On September 13, 2007, this Court released Mr. Chang on a \$50,000 personal
23 recognizance bond secured by his signature and established conditions of pretrial release.
24 Among those conditions is a travel restriction to the Northern District of California.

25 3. On May 12, 2008, Mr. Chang informed me of his wish to vacation in the Los
26 Angeles County in the Central District of California, departing the Northern District of California

1 by car on May 24, 2008 and returning on May 26, 2008, with a day trip to San Diego, in the
2 Southern District of California on May 25, 2008.

3 4. On May 12, 2008, I communicated via e-mail with Assistant United States
4 Attorney Thomas Moore regarding Mr. Chang's request. Mr. Moore indicated the same day that
5 he had no objection to the proposed travel.

6 5. On May 12, 2008, I sent an e-mail message to United States Pretrial Services
7 Officer Laura Weigel regarding Mr. Chang's request. On May 14, 2008, I spoke with Officer
8 Weigel, who indicated that she had no objection to the proposed travel.

9 I declare that the foregoing is true and correct and of my personal knowledge, except as to
10 those matters stated on information and belief, and as to those matters, I believe them to be true.

11 Executed this 14th of May 2008 in San Jose, California.

12 s/_____
13 CYNTHIA C. LIE
14 Assistant Federal Public Defender
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